

**KELLEY DRYE & WARREN LLP**

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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

PEGGY BANKS, individually and on behalf  
of all others similarly situated,  
  
Plaintiff,  
  
v.  
  
SUNRUN INC.  
  
Defendant.

Case No. 4:23-cv-07877-JST

**DECLARATION OF GLENN T.  
GRAHAM IN SUPPORT OF JOINT  
STIPULATION TO AMEND  
SCHEDULING ORDER**

I, Glenn T. Graham, declare:

1. I am an attorney duly licensed to practice law in the State of California and before this Court. I am a partner at the law firm of Kelley Drye & Warren LLP and counsel of record for Defendant Sunrun Inc. (“Sunrun”) in the above-captioned action. I make this declaration based on my personal knowledge. If called as a witness, I could and would competently testify to the information stated herein.

2. Sunrun and Plaintiff (collectively, the “Parties”) are currently actively engaged in discovery.

3. The Parties are actively engaged in resolving deficiencies to such discovery responses between themselves and without need for judicial intervention.

4. The Parties further wish to keep the above-captioned case’s schedule consistent with the schedule with the related case, *Strickland v. Sunrun, Inc.*, No. 5:23-cv-05034-JST (N.D. Cal.) by similarly extending the current deadlines by approximately 60 days as in the joint stipulation

1 filed in Strickland.

2 5. The Parties agree that efficiency dictates an approximate 60-day extension of the  
3 upcoming deadlines to afford the Parties, as reflected below:

4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
	Event	Current Deadline	Proposed Deadline														
	Expert Disclosures	November 19, 2025	January 16, 2026														
	Expert Rebuttal	December 22, 2025	February 20, 2026														
	Discovery cut-off	January 15, 2026	April 14, 2026														
	Deadline to conduct private mediation	January 19, 2026	April 28, 2026														
	Last day to file dispositive motions	April 2, 2026	June 1, 2026														
	Last day to file oppositions to dispositive motions	April 30, 2026	June 29, 2026														
	Last day to file replies to dispositive motions	June 4, 2026	August 3, 2026														
	Dispositive motion hearing	June 25, 2026	August 27, 2026														
	Last day to file motion for class certification	July 30, 2026	September 28, 2026														
	Last day to file opposition to class certification	September 3, 2026	November 2, 2026														
	Last day to file reply in further support of class certification	October 1, 2026	November 30, 2026														

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23 6. The Parties previously stipulated to a 14-day extension of Sunrun's time to respond  
24 to the Complaint (Dkt. 13).

25 7. The Parties previously stipulated to amend the scheduling order (Dkt. 44), which was  
26 so-ordered on October 2, 2025 (Dkt. 45).

1 I declare under penalty of perjury that the foregoing is true and correct.

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3 Executed on November 14, 2025, in Madison, New Jersey.

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5 By: /s/ Glenn T. Graham  
6 Glenn T. Graham  
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